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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**THIRD STIPULATION TO CONTINUE  
HEARING AND MODIFY BRIEFING  
SCHEDULE REGARDING REORGANIZED  
DEBTORS' SEVENTY-NINTH OMNIBUS  
OBJECTION TO CLAIMS – CLAIM OF  
DAVID ADDINGTON (CLAIM NO. 3093)**

**[Related to Docket No. 10673]**

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors  
2 (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases  
3 (the “**Chapter 11 Cases**”), by and through their counsel, on the one hand, and Creditor David P.  
4 Addington (“**Addington**”) on the other hand, hereby stipulate and agree as follows:

5 **RECITALS**

6 A. On November 10, 2021, the Court entered the *Scheduling Order on Seventy-Ninth*  
7 *Omnibus Objection to Claims as to David Addington (Proof of Claim # 3093)* [Docket No. 11572] (the  
8 “**Scheduling Order**”), setting forth a schedule for briefing on the Reorganized Debtors’ objection to  
9 Proof of Claim No. 3093 filed by Addington.

10 B. On December 21, 2021, to allow the parties additional time to file their joint statement of  
11 undisputed facts, the Reorganized Debtors and Addington entered into a stipulation to modify the  
12 scheduling order [Docket No. 11737], which was approved by the *Order Approving Stipulation to*  
13 *Continue Hearing and Modify Briefing Schedule Regarding Reorganized Debtors’ Seventy-Ninth*  
14 *Omnibus Objection to Claims – Claim of David Addington (Claim No. 3093)* entered on December 22,  
15 2021 [Docket No. 11741].

16 C. On December 21, 2021, the parties filed the *Parties’ Joint Statement of Undisputed Facts*  
17 *Regarding Reorganized Debtors’ Seventy-Ninth Omnibus Objection to Claims – Claim of David*  
18 *Addington (Claim No. 3093)* [Docket No. 11736].

19 D. On December 29, 2021, the Reorganized Debtors filed the *Reorganized Debtors’*  
20 *Opening Brief in Support of Objection to Claim of David Addington (Claim No. 3093)* [Docket  
21 No. 11767].

22 E. On January 28, 2022, upon Addington’s request that the Scheduling Order be further  
23 modified, the Reorganized Debtors and Addington entered into a second stipulation to modify the  
24 scheduling order [Docket No. 11879], which was approved by the *Order Approving Second Stipulation*  
25 *to Continue Hearing and Modify Briefing Schedule Regarding Reorganized Debtors’ Seventy-Ninth*  
26 *Omnibus Objection to Claims – Claim of David Addington (Claim No. 3093)* [Docket No. 11882] entered  
27 on January 31, 2022  
28

1 F. Addington has requested additional time to file his response brief, and the Reorganized  
2 Debtors are agreeable to that request, and therefore the Parties seek to revise the Scheduling Order as set  
3 forth below.

4  
5 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**  
6 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**  
7 **JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

8 1. The Stipulation is approved. The Scheduling Order is further modified as set forth below.

9 2. Mr. Addington's response brief will be filed with the Court and served by e-mail on  
10 counsel for the Reorganized Debtors no later than April 1, 2022.

11 3. The Reorganized Debtors' reply brief will be filed no later than May 3, 2022.

12 4. The hearing on the Reorganized Debtors' objection to the claim of Mr. Addington is  
13 continued to **May 10, 2022**, at 10:00 a.m. (Pacific Time).

14 5. A scheduling conference will be held on **March 29, 2022**, at 10:00 a.m. to consider any  
15 further amendments to the Scheduling Order, provided that if Mr. Addington does not require any  
16 additional time to submit his response brief, he may notify the courtroom deputy and counsel for the  
17 Reorganized Debtors by e-mail no later than March 22, 2022, and the scheduling conference will be  
18 taken off calendar.

19 March 1 ~~28~~  
Dated: ~~February~~, 2022

20 KELLER BENVENUTTI KIM LLP

21  
22 /s/ Thomas B. Rupp  
23 Thomas B. Rupp  
24 Attorneys for Debtors and  
25 Reorganized Debtors

26  
27 /s/  
28 David P. Addington